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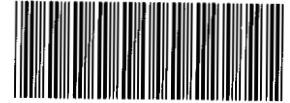
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EM-453 (J. Ciocco, 903-7459)

Comments for Final Technical Memorandum Number 10, for Operable Unit 1

R. Schassburger, Rocky Flats Office

The Office of Southwestern Area Programs, Rocky Flats Branch, has reviewed the "Final Technical Memorandum Number 10, Development of Remedial Action Objectives, 881 Hillside Area (Operable Unit 1), Rocky Flats Plant," document. Please address these comments during the document finalization process.

Our main concern with the document is the issuance of this document as final seems premature given that the baseline risk assessment will not be delivered to the Environmental Protection Agency until November, and the Environmental Evaluation is still in draft form. It is possible that not only the risk assessment results will change, but, pending completion and review of these documents, the overall framework could require change.

Please contact me at 301-903-8191 or Jeff Ciocco at 301-903-7459 if you have any questions regarding these comments.

Autar Rampertaap

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Chief

Rocky Flats Branch

Rocky Flats/Albuquerque Production Division

Office of Southwestern Area Programs

Attachment

cc w/o attachment:
R. Greenberg, EM-453
S. Grace, RF

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REPLY TO
ATTN OF: EM-453 (J. Ciocco, 903-7459)

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SUBJECT: Comments for Final Technical Memorandum Number 10, for Operable Unit 1

TO: R. Schassburger, Rocky Flats Office

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Autar Rampertaap
Chief
Rocky Flats Branch
Rocky Flats/Albuquerque Production Division
Office of Southwestern Area Programs

Attachment

cc w/o attachment:
R. Greenberg, EM-453
S. Grace, RF

FINAL TECHNICAL MEMORANDUM NUMBER 10
DEVELOPMENT OF REMEDIAL ACTION OBJECTIVES
881 HILLSIDE AREA (OPERABLE UNIT 1)
ROCKY FLATS PLANT

GENERAL COMMENTS

1. The introduction states that no Contaminants of Concern (COC) were identified in the Environmental Evaluation (EE) that require more stringent Preliminary Remediation Goals (PRGs) than those to be developed for human health. A brief description of the EE approach and results is needed.
2. Although the remediation of sediment and surface water is to be dealt with administratively under Operable Unit (OU) 5, how the PRGs derived for OU 1 are influenced by remediation of OU 5 should be discussed. Where overlapping sources contribute to a single exposure point, all sources must be remediated to reduce risk below appropriate levels at the exposure point. Thus, the PRGs for each source must reflect cumulative impacts at the single exposure point. This aspect should be presented in this document with more detail.
3. The document does not clearly present the remedial action objectives. Especially unclear is the presentation of the Applicable or Relevant and Appropriate Requirements (ARARs), and the relationship between ARARs and the risk-based goals. The purpose of the document, as stated in the text, is to document the process by which goals were developed for remediation at OU 1. The relationship between the ARARs and risk-based goals requires further clarification.

Inclusion of a table is recommended that contrasts risk-based goals with ARAR-based goals to show significant difference.

SPECIFIC COMMENTS:

1. Sect. 2.0, p. 3, second paragraph: Because the values presented in this technical memorandum could change based on the results of the preliminary health evaluation (also the contaminants of concern could change), it may be appropriate to refer to this document as a draft final rather than final.
2. Table 2-1, p. 6: The meaning of the "X" marked in each box is unclear. If the meaning is that contaminant is of concern in that media, then contaminants marked with an "X" in surface water and sediment media columns would conflict with the footnote. Please clarify.
3. Table 2-2: Please verify that this table is correct. For example, the predominate pathways for on-site individual workers would be the same for both current and future scenarios.
4. Sect. 2.2, p. 8, second paragraph: Please clarify why a distinction is drawn between OU 1 wide and Individual Hazardous Substance Site (IHSS) 119.1-specific risk calculated values. The rest of the document does not indicate that IHSS-specific values were used.

5. Sect. 2.4.1, p. 12, first paragraph: The timing of the choice of ARARs (i.e., waiting until after the selection of the alternatives) leaves the potential for inadequate screening of alternatives because of a lack of defined alternatives. Defining ARARs into those that will definitely be applied from those that are of questionable application is recommended.
6. Sect. 2.4.1, p. 13, third paragraph: Please clarify the phrase "at the request of the Environmental Protection Agency and Colorado Department of Health the non-zero Maximum Contaminant Level Goals are deemed relevant and appropriate." Please explain the nature of the request, the rationale for the request should also be presented.
7. Sect. 2.4.1, p. 15, second paragraph: The application of surface water requirements should be further clarified (i.e., the relationship of the OU 5 investigation and remediation with the OU 1 remediation).
8. Sect. 2.4.2, p. 19, Second Paragraph: This paragraph states that a PRG for each COC was derived using a risk level of 10^{-6} for carcinogens and a hazard index of one for non-carcinogens. This approach is potentially nonconservative for noncarcinogens because of the additivity of contaminants. Please explain how additivity will be accounted for in the cleanup.

This paragraph also states that it may be impossible to verify that PRGs have been achieved after remedial action using conventional analytical techniques. Please discuss whether special analytical techniques will be used. In cases where no special techniques are available, the proposed approach to modifying PRGs should be presented.

9. Sect. 2.4.2, p. 19, Third paragraph: The PRGs for surface and subsurface soils are derived based on exposure to soils. This approach excludes leaching of contaminants into groundwater. Please discuss how leaching will be addressed in the development of remediation goals.